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17	UNITED STATE	S DISTRICT COURT
18	NORTHERN DISTI	RICT OF CALIFORNIA
19	SAN JOS	SE DIVISION
20		
21	IN RE META PIXEL TAX FILING CASES	Case No. 5:22-cv-07557-PCP (VKD)
22		DEFENDANT META PLATFORMS, INC.'S ADMINISTRATIVE MOTION TO SEAL
23	This Document Relates To:	PARTS OF PLAINTIFFS' MOTION TO CERTIFY A CLASS
24	All Actions	Hon. P. Casey Pitts
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I. INTRODUCTION

Defendant Meta Platforms, Inc. ("Meta") hereby applies for leave of this Court pursuant to Local Civil Rules 7-11 and 79-5 to seal parts of plaintiffs' Motion to Certify a Class and its supporting exhibits (the "Motion and Exhibits"). This Court and other courts in this District have previously granted administrative motions to seal under Civil Local Rule 79-5 where a party has shown that a document (or portions thereof) is "privileged, protectable as a trade secret or otherwise entitled to protection under the law" and the request is "narrowly tailored to seal only the sealable material." Singh v. Costco Wholesale Corp., 2023 WL 4335287, at *1 (N.D. Cal. May 11, 2023); see also, e.g., Jones v. PGA Tour, Inc., 2023 WL 2167400, at *2 (N.D. Cal. Feb. 21, 2023); Arebalo v. Apple, Inc., 2022 WL 580865, at *2 (N.D. Cal. Feb. 25, 2022).

Meta asks the Court to seal select parts of the Motion and Exhibits that reveal specific, nonpublic information about (1) Meta's proprietary data storage systems, including the names of specific Hive tables, descriptions of fields in those tables and the contents of those fields, specific information about how those systems are organized, the types of information Meta can query from those systems, how data flows through those systems, and how Meta uses the data stored in those systems; (2) Meta's proprietary finance-related and health-related integrity systems, including how those systems work and when they were developed; (3) the confidential methods that Meta uses to try to match data it receives from third-party advertisers to a Facebook account; (4) Meta's proprietary Core Setup system, including how the system works and how it was developed; (5) confidential business analyses by Meta employees and actions taken in connection with or as a result of those analyses; (6) confidential communications with advertisers and steps taken by Meta in response to those communications; (7) links to internal confidential webpages, which could be used to improperly gain access to Meta's proprietary documents and intranet; and (8) employee contact information, including employee email addresses.

Meta's request is "narrowly tailored" because it seeks to seal only material that reflects Meta's internal, proprietary, commercially sensitive, and confidential information. The Motion and Exhibits

describes specific confidential information about Meta's internal systems and technologies. Decl. of Lauren R. Goldman in Supp. of Def. Meta Platforms, Inc.'s Administrative Mot. to Seal ("Goldman Decl.") ¶ 2. Public disclosure of this confidential information would place Meta at a competitive disadvantage in the marketplace and could allow bad actors to undermine the integrity of Meta's systems and gain improper access to user data. *Id.* ¶¶ 3, 6, 8-9. Furthermore, the disclosure of the information Meta seeks to seal—details related to Meta's proprietary internal systems, technologies, and processes—could allow bad actors to compromise Meta's systems and gain access to the data Meta receives and stores, including data related to users. Meta's interest in sealing proprietary, competitively sensitive information or information that bad actors could use to undermine the integrity of Meta's systems and gain improper access to user data overrides any public interest in the specific details Meta seeks to seal. Accordingly, there is "compelling reason" to seal narrow parts of the Motion and Exhibits.

II. LEGAL STANDARD

The Court has "broad discretion to permit sealing of court documents for, *inter alia*, the protection of 'a trade secret or other confidential research, development, or commercial information." *Hadley v. Kellogg Sales Co.*, 2018 WL 7814785, at *1 (N.D. Cal. Sept. 5, 2018) (citing Fed. R. Civ. P. 26(c)(1)(G)). What constitutes a sufficient basis to seal a document is "best left to the sound discretion of the trial court," and sufficient grounds include "sources of business information that might harm a litigant's competitive standing." *Ctr. for Auto Safety v. Chrysler Grp.*, *LLC*, 809 F.3d 1092, 1097 (9th Cir. 2016) (citing *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 598-99 (1978)).

For a motion to seal documents in connection with a dispositive motion, a movant must meet the "compelling reason" standard. *Ctr. for Auto Safety*, 809 F.3d, at 1102 (quoting *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 33 (1984)). Under this standard, the public's right to inspect and access court records "can be overridden given sufficiently compelling reasons for doing so." *Foltz v. State Farm Mut. Auto Ins. Comp.*, 331 F.3d 1122, 1135 (9th Cir. 2003). Relevant factors in deciding whether a party's interest in sealing overcomes the public's interest in disclosure include: (1) the amount of material sought to be sealed (*see Algarin v. Maybelline, LLC*, No. 12-CV-3000-AJB (DHB), at *3 (S.D. Cal. Feb. 21, 2014)); (2) the "public interest in understanding the judicial process" (*Ctr. for Auto Safety*

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v. Chrysler Grp., LLC, 747 F. App'x 463, 465 (9th Cir. 2018)), and (3) "whether disclosure of the material could result in improper use of the material for scandalous or libelous purposes or infringement upon trade secrets" (Id.)."

III. **ARGUMENT**

The Court should seal select confidential information in the Motion and Exhibits. "compelling reason" test applies here, because the Motion and Exhibits relate to a dispositive issue that is "more than tangentially related to the merits of the case." Ctr. for Auto Safety, 809 F.3d, at 1097. And compelling reason to seal narrow portions of the Motion and Exhibits exists for several reasons.

First, Meta's sealing request is "narrowly tailored to seek sealing only of sealable material." Singh v. Costco Wholesale Corp., No. 20-CV-08180-NC, 2023 WL 4335287, at *1 (N.D. Cal. May 11, 2023). Meta asks the Court to seal only those parts of the Motion and Exhibits that reveal proprietary, commercially sensitive, and confidential information about Meta's non-public data storage systems, finance-related and health-related integrity systems, methods Facebook uses to try to match it receives from third-party advertisers to Facebook accounts, Core Setup functionality, business analyses and steps Meta took in connection with or as a result of those analyses, confidential communications with advertisers, links to internal confidential webpages, and employee contact information.

Second, as the Supreme Court has recognized, the public right of access to court records may be limited when those records could be used "as sources of business information that might harm a litigant's competitive standing." Nixon v. Warner Commc'ns, Inc., 435 U.S. 589, 598 (1978). Meta is likely to suffer harm if highly confidential information regarding the subject matter listed above is made public. Goldman Decl. ¶ 8.

Third, there is "a compelling reason to seal" information that could compromise a party's "network infrastructure and security systems." Music Grp. Macao Com. Offshore Ltd. v. Foote, No. 14-CV-03078-JSC, 2015 WL 3993147, at *6 (N.D. Cal. June 30, 2015). The "compelling reasons" standard is clearly met here because the disclosure of specific information about Meta's systems, technologies, and employee contact information is competitively sensitive and/or could empower bad actors to exploit Meta's systems and misuse data stored by Meta, including data related to users. Goldman Decl. ¶¶ 8-9.

Courts routinely protect the type of information that Meta seeks to seal here. For example, in Bottoms v. Block, Inc., the court found that the compelling interests warranted sealing of specific fields in Block's database. See No. 2:23-CV-01969-MJP, 2025 WL 774913, at *1 (W.D. Wash. Mar. 11, 2025) (compelling interests warrant sealing "the confidential name of a Block database used to store information related to the Cash App Invite Friends program, and the confidential names and descriptions of certain fields of data stored in the database"). See also Phillips ex rel. Estates of Byrd v. Gen. Motors Corp., 307 F.3d 1206, 1211 (9th Cir. 2002) (holding "confidential . . . commercial information" was entitled to protection from disclosure); Calhoun v. Google LLC, No. 20-CV-05146-YGR (SVK), 2022 WL 1122843, at *3 (N.D. Cal. Apr. 14, 2022) (allowing redactions for references to "sensitive features of Google's internal systems and operations, including the various types of data sources which include information related to Google's data logs, internal data structures, internal identifiers and their proprietary functions"); Ojmar US, LLC v. Sec. People, Inc., 2016 WL 6091543, at *2 (N.D. Cal. Oct. 19, 2016) (noting protections afforded by courts within the Ninth Circuit are broad and extend to "confidential information regarding [a defendant's] products, services, and business practices"). Plaintiffs filed the Motion and Exhibits partially under seal. Meta proposes narrowly tailored redactions that would keep only its most sensitive, non-public material sealed

In conclusion, Meta's request is narrowly tailored to seal only the most sensitive, non-public information contained within the Motion and Exhibits that reveal proprietary details about Meta's storage systems, finance-related and health-related integrity systems, data matching technologies, Core Setup functionality, business analyses and steps taken in connection with those analyses, communications with advertisers, links to internal confidential webpages, and employee contact information. Disclosure of this information would place Meta at a competitive disadvantage and is unnecessary to the public's understanding of this case. Given these circumstances, Meta respectfully requests that the Court grant Meta's motion to seal parts of the Motion and Exhibits. Meta's positions regarding the confidential portions of the Exhibit are set forth in the table attached as Appendix A.

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1	Dated: September 8, 2025	GIBSON, DUNN & CRUTCHER LLP
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1	Document	Portions of Document to	Designating	Reason for Redaction
2		Be Sealed	Party	
3 4 5	Notice of Motion and Motion for Class Certification Supporting	Parts of page 1, lines 7, 9-12. (highlighted in Dkt. No. 223)	Meta	This text should be redacted because it reveals specific, non-public information about strategic issues analyzed by Meta employees and actions that Meta
6	Memorandum of			took in connection with those analyses. If this information
7	Points and Authorities			were disclosed, it would
8	(Dkt. No. 218)			competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
9	Notice of Motion	Parts of page 2, line 21;	Meta	This text should be redacted
10 11	and Motion for Class Certification	page 13, lines 21-22, 24, 26-28; page 14, lines 1-3, 10-11		because it reveals specific, non- public information about Meta's proprietary data storage systems,
12	Supporting	10-11		including the names of specific fields and their contents, as well
13	Memorandum of Points and	(highlighted in Dkt. No.		as how these systems are
14	Authorities	223)		organized and how the data is used. If this information were
15	(Dkt. No. 218)			disclosed, it would competitively harm Meta and allow bad actors
16				to undermine the integrity of Meta's systems.
17	Notice of Motion	Parts of page 5, lines 6, 9-	Meta	This text should be redacted
18	and Motion for Class	10, 13; page 17, line 25; page 18, lines 1-2.		because it reveals specific, non- public information about Meta's
19	Certification Supporting	(highlighted in Dkt. No.		proprietary finance-related integrity systems that Meta uses
20	Memorandum of	223)		to filter potentially sensitive data. If this information were
21	Points and Authorities			disclosed, it would competitively harm Meta and allow bad actors
22	(Dkt. No. 218)			to undermine the integrity of those systems.
23	Declaration of	Parts of page 3, line 10.	Meta	This text should be redacted because it reveals specific, non-
24	Neal Deckant In Support of	(highlighted in Dkt. No.		public information about Meta's
25	Motion for Class Certification	223-1)		proprietary data storage systems, including the name of a specific
26	(Dkt. No. 218-1)			Hive tables the amount of data in Meta's systems. If this
27				information were disclosed, it
28				would competitively harm Meta and allow bad actors to

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1				undermine the integrity of Meta's systems.
3	Exhibit 13 (Dkt. No. 218-1)	Parts of page 28, lines 2- 4; page 49, lines 15-19, 25;	Meta	This text should be redacted because it reveals specific, non-
4	140. 210-1)	page 50, lines 1-2, 9-10, 13-		public information about Meta's proprietary data storage systems
5		15, 21-25; page 51, lines 1-8, 10-11, 14-15, 19-21;		(including the names of specific
6		page 56, line 24; page 66, lines 8-13, 16; page 70,		Hive tables and fields, what information those fields contain,
7		lines 5-10; page 91, lines 7, 13, 21-23; page 100, lines		how the systems can be queried, and how the systems are organized); and the proprietary
8		13-19, 24; page 101, lines 8, 12-16, 19; page 102,		methods that Meta uses to try to
9		lines 6-10, 24-25; page 103, lines 1, 6-8, 21; page 104,		match data sent by third-party advertisers to a Facebook
10		lines 4-7, 9-10, 15-17; page 106, lines 5, 20-21, 23-24;		account. If this information were disclosed, it would competitively
11		page 107, line 2; page 108,		harm Meta and allow bad actors to undermine the integrity of
12		lines 8-11; page 109, lines 1-11, 20-24; page 110, lines		Meta's systems.
13		6-11, 21-25; page 111, lines 1-3, 7-8, 17, 19-22; page		
14		112, lines 1-2, 4-6, 11-12,		
15		16-24; page 113, lines 3-6, 16-23; page 114, lines 1-4,		
16		6-7, 10-12, 14-17, 22-25;		
17		page 115, lines 2-9, 12-13, 15-16, 19-24; page 116,		
18		lines 6-8; page 117, lines 10, 13-17, 19-25; page 118,		
19		lines 1-2, 4-8, 10-14, 17-23;		
20		page 119, lines 5, 9, 11-12, 16-20; page 127, lines 1-5,		
21		9-13, 25; page 128, lines 1-2; page 129, lines 5, 14, 24;		
22		page 130, lines 1-4, 6-11,		
		13-14, 16-19, 21-22; page 131, lines 3, 5-6, 10, 14, 17-		
23		21, 23; page 132, lines 3, 7-9, 12, 14-17, 19, 22, 24-25;		
24		page 149, lines 23, 25; page		
25		150, lines 1-6, 18-19, 24; page 151, lines 1-2, 7, 9,		
26		14-15, 19-22, 24-25; page 157, lines 4-7, 10-13; page		
27		172, lines 21-22; page 206,		
28		lines 7-12, 19-21.		

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1 2		(highlighted in Dkt. No. 223-1)		
3	Exhibit 13 (Dkt. No. 218-1)	Parts of page 46, lines 4, 7-12, 15-16, 18, 25; page 47,	Meta	This text should be redacted because it reveals specific, non-
4	1.0.2101)	line 5; page 73, lines 8-10; page 149, line 20; page 158,		public information about Meta's finance-related integrity systems
5		lines 8-17, 21-24; page 159, lines 3-6, 10, 13-23; page		used to filter potentially sensitive data. If this information were
6 7		209, lines 23-25. (highlighted in Dkt. No.		disclosed, it would competitively harm Meta and allow bad actors
8		(inginigated in Dkt. No. 223-1)		to undermine the integrity of Meta's systems.
9	Exhibit 13 (Dkt. No. 218-1)	Parts of page 174, lines 23-25; page 175, lines 10-11.		This text should be redacted because it reveals specific, non-
10		(highlighted in Dkt. No.		public information about Meta's confidential communications
11		223-1)		between Meta and Taxslayer, as well as steps taken by Meta in
12				connection with those communications. If this
13 14				information were disclosed, it would competitively harm Meta
15				because it would reflect competitively sensitive
16				information about Meta's treatment of data resulting from
17				communications with third parties like Taxslayer.
18	Exhibit 14	Parts of page 1, "From" lines, "To" line, "BCC"	Meta	This text should be redacted because it reveals specific, non-
19	(Dkt. No. 218-1	line, paragraph 1; page 2, paragraph 10.		public information about an advertiser's Pixel and account
20 21		(highlighted in Dkt. No.		with Meta, as well as employee contact information. If this
22		223-1)		information were disclosed, it would competitively harm
23				Meta. Further, if the employee contact information were
24				publicly disclosed, Meta's employees may be inundated
25				with harmful or irrelevant emails from outside Meta, which would
26				disrupt Meta's operations, and Meta would face competitive
27				harm

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1 2	Exhibit 15	Parts of page 1, "To" line, "Subject" line, messages 1,	Meta	This text should be redacted because it reveals specific, non-
	(Dkt. No. 218-1	3, 5-6, 9-11, 13, 15; page 2,		public information about Meta's
3		messages 1-5, 7, 9-12, 15-		finance-related integrity systems, confidential business analyses by
4		18, 20-21; page 3, messages 1-3.		Meta employees and steps taken in connection with those
5		(highlighted in Dkt. No. 223-1)		analyses (including internal, non-public communications
6				discussing responses to the
7				receipt of potentially sensitive information), and employee
8				contact information. If this
9				information were disclosed, it would competitively harm Meta,
10				permit a glimpse into Meta's internal brainstorming and
11				response plans (which competitors could use), and
12				allow bad actors to undermine
13				the integrity of Meta's systems. Further, if the
14				employee contact information
15				were publicly disclosed, Meta's employees may be inundated
16				with harmful or irrelevant emails from outside Meta, which would
				disrupt Meta's operations, and
17				Meta would face competitive harm.
18	Exhibit 16	Sealed in full.	Meta	This exhibit should be sealed in
19	(Dkt. No. 218-1	Scarca III Tuii.	Ivicia	full because it contains discussion of event data
20				including specific field names
21				and descriptions of those fields—which is proprietary,
22				commercially sensitive, and
23				confidential. Public disclosure of that information—including the
				specific way that Meta
24				processes, organizes, and stores event data—would place Meta at
25				a competitive disadvantage and
26				could allow bad actors to undermine the integrity of
27				Meta's systems
28	Exhibit 17	Sealed in full.	Meta	This exhibit should be sealed in full because it contains

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1		(Dkt. No. 218-1			discussion of event data—
2					including specific field names
2					and descriptions of those fields—which is proprietary,
3					commercially sensitive, and
4					confidential. Public disclosure of
5					that information—including the specific way that Meta
					processes, organizes, and stores
6					event data—would place Meta at
7					a competitive disadvantage and could allow bad actors to
8					undermine the integrity of
					Meta's systems
9		Exhibit 18	Sealed in full.	Meta	This exhibit should be sealed in
10		(Dkt. No. 218-1)			full because it contains discussion of event data—
11		,			including specific field names
10					and descriptions of those
12					fields—which is proprietary, commercially sensitive, and
13					confidential. Public disclosure of
14					that information—including the
1.5					specific way that Meta processes, organizes, and stores
15					event data—would place Meta at
16					a competitive disadvantage and
17					could allow bad actors to
					undermine the integrity of Meta's systems
18	•	Exhibit 19	Parts of page 10, lines 7-9,	Meta	This text should be redacted
19		(Dkt. No. 218-1)	11-12, 14-15, 24-25; page	TVICta	because it reveals specific non-
20		(DKt. No. 216-1)	17, line 12; page 19, lines		public information about how Meta's proprietary Core Setup
21			19-21.		setting works. Meta would
21			(highlighted in Dkt. No.		suffer competitive harm if
22			223-1)		confidential information about this setting was publicly
23					disclosed. Further, disclosure of
24					this information would give bad
					actors information that could be used to try to circumvent Meta's
25					Core Setup setting.
26		Exhibit 20	Sealed in full.	Meta	This exhibit should be sealed in
27		(Dkt. No. 218-1)			full because it reveals specific non-public information about
		(DR. 110. 210 1)			how Meta's proprietary Core
28					Setup setting works. Meta

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1 2				would suffer competitive harm if confidential information about this setting was publicly disclosed. Further, disclosure of
3				this information would give bad
4				actors information that could be used to try to circumvent Meta's
5				Core Setup setting.
6	Exhibit 22	Sealed in full.	Meta	This text should be redacted because it contains discussion of
7	(Dkt. No. 218-1)			event data—including specific field names and descriptions of
8				those fields—which is proprietary, commercially
9				sensitive, and confidential.
10				Public disclosure of that information—including the
11				specific way that Meta processes, organizes, and stores
12				event data—would place Meta at
13				a competitive disadvantage and could allow bad actors to
14				undermine the integrity of Meta's systems
15	Exhibit 23	Parts of page 1, "From"	Meta	This text should be redacted because it reveals specific, non-
16	(Dkt. No. 218-1)	line, "To" line, messages 16-18.		public information about Meta's
17		(highlighted in Dkt. No.		employee contact information, and links to internal confidential
18		223-1)		webpages, which could be used to improperly gain access to
19				Meta's proprietary documents and intranet. If this information
20				were disclosed, it would
21				competitively harm Meta and allow bad actors to undermine
22				the integrity of Meta's systems. Further, if the
23				employee contact information
24				were publicly disclosed, Meta's employees may be inundated
25				with harmful or irrelevant emails from outside Meta, which would
26				disrupt Meta's operations, and Meta would face competitive
27				harm.

1	Exhibit 24	Parts of page 1, "To" line,	Meta	This text should be redacted
2	(Dkt. No. 218-1)	"Subject" line,		because it reveals specific, non- public information about Meta's
3		"Attachments" line, messages 1-13, 15; page 2,		proprietary data storage systems
		messages 1-4, 6-13, 15-22;		(including the names of specific
4		page 3, messages 1-2, 5-20;		Hive tables and fields, how the systems are organized, and how
5		page 4, messages 1-6, 8-9, 11, 13-20; page 5, messages		Meta uses the data it receives
6		1-11.		and stores), business analyses and steps taken in connection
7		(highlighted in Dkt. No.		with those analyses, and
		223-1)		employee contact
8				information. If this information were disclosed, it would
9				competitively harm Meta and
10				allow bad actors to undermine the integrity of Meta's
11				systems. Further, if the
12				employee contact information were publicly disclosed, Meta's
				employees may be inundated
13				with harmful or irrelevant emails
14				from outside Meta, which would disrupt Meta's operations, and
15				Meta would face competitive
16				harm. This text should be redacted
	Exhibit 25	Parts of page 1, "From" line, "To" line, "Subject"	Meta	because it reveals specific, non-
17	(Dkt. No. 218-1)	line, messages 2-6, 8-12,		public information about Meta's
18		14-15; page 2, messages 3-4, 7, 9-11.		proprietary finance-related integrity systems, business
19		(highlighted in Dkt. No.		analyses and steps taken in
20		223-1)		connection with those analyses, and employee contact
21				information. If this information
22				were disclosed, it would competitively harm Meta and
				allow bad actors to undermine
23				the integrity of Meta's systems. Further, if the
24				employee contact information
25				were publicly disclosed, Meta's employees may be inundated
26				with harmful or irrelevant emails
27				from outside Meta, which would disrupt Meta's operations, and
				Meta would face competitive
28				harm.

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1 2 3 4 5 6	Exhibit 26 (Dkt. No. 218-1)	Sealed in full.	Meta	This exhibit should be sealed in full because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific fields and how they are used. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
7 8 9 10 11 12 13 14	Exhibit 27 (Dkt. No. 218-1)	Parts of page 3, paragraphs 1-5, 7-15; page 4, paragraphs 3-7, 9-13; page 5, paragraphs 3, 5; page 6, paragraph 1. (highlighted in Dkt. No. 223-1)	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific Hive tables and fields and how the systems can be queried. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
15 16 17 18 19	Exhibit 27, exhibit 2 (Dkt. No. 218-1)	Parts of page 1, paragraphs 5-27; page 2, paragraphs 1-27; page 3, paragraphs 1-22. (highlighted in Dkt. No. 223-1)	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific Hive tables. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
 20 21 22 23 24 25 26 27 	Exhibit 28 (Dkt. No. 218-1)	Parts of page 8, paragraphs 1-2, 4, 6; page 9, paragraphs 1-2; page 12, paragraph 4; page 13, paragraphs 5, 8; page 14, heading D, paragraph 4; page 15, paragraphs 1-3, chart, paragraphs 4-6; page 16, paragraphs 1, 4; page 18, paragraphs 8, 16-17. (highlighted in Dkt. No. 223-1)	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific Hive tables and fields, how the systems can be queried, and how the systems are organized. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.

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1 2		ibit 28, nibit E	Sealed in full.	Meta	This exhibit should be sealed in full because it is an internal
	(Dkt. N	Jo. 218-1)			technical document, which reveals specific non-public
3					information about Meta's
4					proprietary data storage systems (including the names of specific
5					Hive tables and how data flows
6					through the storage systems) and Pixel capabilities. If this
7					information were disclosed, it
8					would competitively harm Meta and allow bad actors to
9					undermine the integrity of
			~ 1 1: 0 !!		Meta's systems. This exhibit should be sealed in
10		ibit 28, nibit F	Sealed in full.	Meta	full because it contains
11	(Dkt. N	Jo. 218-1)			discussion of event data— including specific field names
12					and descriptions of those
13					fields—which is proprietary, commercially sensitive, and
14					confidential. Public disclosure of that information—including
15					the specific way that Meta
16					processes, organizes, and stores event data—would place Meta at
17					a competitive disadvantage and
18					could allow bad actors to undermine the integrity of Meta's
10					systems.
19	Exh	ibit 26	Sealed in full.	Meta	This exhibit should be sealed in full because it reveals specific,
20	(Dkt. N	Jo. 218-1)			non-public information about
21					Meta's proprietary data storage systems, including the names of
22					specific fields and how they are
23					used. If this information were disclosed, it would competitively
24					harm Meta and allow bad actors
					to undermine the integrity of Meta's systems.
25	Exh	ibit 28,	Parts of page 3, line 22;	Meta	This text should be redacted
26		nibit I	page 4, lines 17, 20-21;	1,1010	because it reveals specific non- public information about Meta's
27	(Dkt. N	Jo. 218-1)	page 171, lines 2-3, 7-15.		data storage systems (including
28					the names of specific Hive tables and how the systems are

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1		(highlighted in Dkt. No.		organized), finance-related
2		223-1)		integrity systems, and Core
				Setup setting. If this information were disclosed, it would
3				competitively harm Meta and
4				allow bad actors to undermine
				the integrity of Meta's systems.
5	Exhibit 28,	Sealed in full.	Meta	This exhibit should be sealed in
6	exhibit O			full because it contains
_	(Dkt. No. 218-1)			discussion of event data— including specific field names
7				and descriptions of those
8				fields—which is proprietary,
0				commercially sensitive, and
9				confidential. Public disclosure of
10				that information—including the specific way that Meta
11				processes, organizes, and stores event data—would place Meta at
12				a competitive disadvantage and
13				could allow bad actors to
13				undermine the integrity of
14				Meta's systems. This exhibit should be sealed in
15	Exhibit 28, exhibit P	Sealed in full.	Meta	full because it reveals specific,
				non-public information about
16	(Dkt. No. 218-1)			Meta's proprietary data storage
17				systems, including the names of
1.0				specific Hive tables and fields and how Meta uses the data it
18				receives and stores. If this
19				information were disclosed, it
20				would competitively harm Meta
20				and allow bad actors to
21				undermine the integrity of Meta's systems.
22	Exhibit Q to	Sealed in full.	Meta	This exhibit should be sealed in full because it is an internal
23	Exhibit 28			technical document, which
24	(Dkt. No. 218-1)			reveals confidential business
				analyses and steps taken in connection with those analyses
25				concerning Meta's proprietary
26				data storage systems (including
27				the names of specific tables and fields). If this information were
28				disclosed, it would competitively harm Meta and allow bad actors

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to undermine the integrity of Meta's systems. -16-

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